

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

	)	
In re:	)	
	)	Chapter 11
GreenTech Automotive, Inc.,	)	
	)	Case No. 18-10651
Debtor.	)	
	)	
	)	
In re:	)	
	)	Chapter 11
WM Industries Corp.,	)	
	)	Case No. 18-10652
Debtor.	)	
	)	
	)	
In re:	)	
	)	Chapter 11
Gulf Coast Funds Management, LLC,	)	
	)	Case No. 18-10653
Debtor.	)	
	)	
	)	
In re:	)	
	)	Chapter 11
American Immigration Center, LLC,	)	
	)	Case No. 18-10654
Debtor.	)	
	)	
	)	
In re:	)	
	)	Chapter 11
GreenTech Automotive Capital A-3 GP,	)	
LLC,	)	Case No. 18-10655
	)	
Debtor.	)	
	)	

Kristen E. Burgers (VSB No. 67997)  
HIRSCHLER FLEISCHER  
8270 Greensboro Drive, Suite 700  
Tysons, Virginia 22102  
Telephone: (703) 584-8900  
Facsimile: (703) 584-8901  
Email: kburgers@hf-law.com

*Proposed co-Counsel to the Debtors*

Mark S. Lichtenstein (pro hac vice pending)  
Crowell & Moring LLP  
590 Madison Avenue, 20<sup>th</sup> Floor  
New York, New York 10022  
Telephone: (212) 223-4000  
Facsimile: (212) 223-4001  
Email: mlichtenstein@crowell.com

*Proposed co-Counsel to the Debtors*

In re:	)	
	)	
GreenTech Automotive Partnership A-3,	)	Chapter 11
L.P.,	)	
	)	Case No. 18-10656
Debtor.	)	
	)	

**NOTICE OF HEARING ON FIRST DAY MOTIONS**

**PLEASE TAKE NOTICE** that on February 26, 2018 (the “**Petition Date**”), GreenTech Automotive, Inc. and its affiliated entities WM Industries Corp., Gulf Coast Funds Management, LLC, GreenTech Automotive Capital A-3 GP, LLC, GreenTech Automotive Partnership A-3, L.P. and American Immigration Center, LLC (collectively, the “Debtors”) each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the Eastern District of Virginia (the “**Court**”) commencing the above-captioned chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE** that together with the chapter 11 petitions, the Debtors also requested an expedited hearing before the Court (the “**First Day Hearing**”) to consider certain motions (collectively, the “**First Day Motions**”) filed on the Petition Date and listed on the Proposed First Day Agenda attached hereto as Exhibit A.

**PLEASE TAKE FURTHER NOTICE** that the Court has scheduled the First Day Hearing on **Friday, March 2, 2018, at 1:30 p.m. (prevailing Eastern time)** in Courtroom I of the United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division, 200 South Washington Street, 2nd Floor, Alexandria, Virginia 22314.

**PLEASE TAKE FURTHER NOTICE** that a copy of each of the First Day Motions is enclosed herewith. Copies of each of the First Day Motions may also be obtained by accessing the Court’s website at <https://ecf.vaeb.uscourts.gov> through an account obtained from the Pacer Service Center at 1-800-676-6856 or [www.pacer.gov](http://www.pacer.gov).

**PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one.)**

**PLEASE TAKE FURTHER NOTICE** that the requirement of a written objection to the First Day Motions has been waived. If you do not want the Court to grant the relief requested in the First Day Motions, or if you want the Court to consider your views on the First Day Motions, then you or your attorney must attend the First Day Hearing.

**If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the First Day Motions and may enter an order granting the relief requested in the First Day Motions without further notice or opportunity for objection or hearing.**

Dated: March 1, 2018

Respectfully submitted,

/s/ Kristen E. Burgers

Kristen E. Burgers (VSB No. 67997)  
HIRSCHLER FLEISCHER  
8270 Greensboro Drive, Suite 700  
Tysons, Virginia 22102  
Telephone: (703) 584-8900  
Facsimile: (703) 584-8901  
Email: kburgers@hf-law.com

/s/ Mark S. Lichtenstein

Mark S. Lichtenstein (pro hac vice pending)  
Crowell & Moring LLP  
590 Madison Avenue, 20th Floor  
New York, New York 10022  
Telephone: (212) 223-4000  
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HIRSCHLER FLEISCHER  
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**PROPOSED FIRST DAY AGENDA FOR HEARING ON  
MARCH 2, 2018 AT 1:30 P.M. (PREVAILING EASTERN TIME)**

In support of the following relief requested at the first day hearing, the Debtors refer the Court to the Declaration of Norman D. Chirite in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [Docket No. 7]<sup>1</sup>.

**I. Administrative Motions**

1. Debtors' Motion for an Extension of Time to File Lists, Schedules and Statements of Financial Affairs [Docket No. 2]
2. Debtors' Motion for Entry of an Order Pursuant to Fed. R. Bankr. P. 1015(b) Directing Joint Administration [Docket No. 3]
3. Debtors' Motion for Administrative Order (I) Limiting Number of Recipients of Future Notices and (II) Designating Form and Manner in Which Notices May Be Sent to Certain Interested Parties [Docket No. 4]
4. Debtor's Motion for Entry of an Order (a) Authorizing, But Not Directing, the Debtor to Pay Certain Pre-Petition (i) Wages, Salaries, and Other Compensation, (ii) Reimbursable Employee Expenses, and (iii) Employee Medical and Similar Expenses; and (b) Authorizing and Directing Banks and Other Financial Institutions to Honor All Related Checks and Electronic Payment Requests [Docket No. 5]
5. Motion for Entry of an Order (i) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, (ii) Deeming Utility Companies Adequately Assured of Future Performance, and (iii) Establishing Procedures for Determining Requests for Additional Adequate Assurance [Docket No. 6]

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<sup>1</sup> All docket numbers cited herein refer to the docket numbers in the bankruptcy case of GreenTech Automotive, Inc. (Case No. 18-10651).

## II. Substantive Motions

6. Debtor's Motion for Entry of an Order Approving Key Employee Incentive Program and a proposed form of order thereon [Docket No. 10]

Dated: March 1, 2018

Respectfully submitted,

/s/ Kristen E. Burgers

Kristen E. Burgers (VSB No. 67997)

HIRSCHLER FLEISCHER

8270 Greensboro Drive, Suite 700

Tysons, Virginia 22102

Telephone: (703) 584-8900

Facsimile: (703) 584-8901

Email: kburgers@hf-law.com

/s/ Mark S. Lichtenstein

Mark S. Lichtenstein (pro hac vice pending)

Crowell & Moring LLP

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New York, New York 10022

Telephone: (212) 223-4000

Facsimile: (212) 223-4001

Email: mlichtenstein@crowell.com

*Proposed co-Counsel to the Debtors*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of March, 2018, I caused to be served a true and correct copy of the foregoing Notice of Hearing on First Day Motions, along with (a) the Proposed Agenda attached to the Notice as Exhibit A; (b) a copy of each of the First Day Motions identified therein, and (3) the Order Granting Motion to Expedite Hearing [Docket No. 14], by facsimile and/or e-mail (as noted on the applicable service list) on the parties identified on “Joint Service List” and the “Utilities Service List” attached hereto. The Joint Service list includes (i) the Office of the United States Trustee, (ii) the Securities and Exchange Commission, (iii) all secured creditors of each of the Debtors herein, (iv) all taxing authorities, and (v) all parties identified on the List of 20 Largest Unsecured Creditors filed by each of the Debtors herein.

/s/ Kristen E. Burgers  
Kristen E. Burgers

**JOINT SERVICE LIST**

Office of the United States Trustee  
115 S. Union Street, Room 210  
Alexandria, Virginia 22314  
Facsimile: (703) 557-7176  
E-mail: [ustpreion04.ax.ecf@usdoj.gov](mailto:ustpreion04.ax.ecf@usdoj.gov)

US Securities & Exchange Commission  
950 E. Paces Ferry Road, NE, Suite 900  
Atlanta, GA 30326-1382  
Facsimile: (404) 842-7666

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346  
E-mail: [Valerie.Riley@irs.gov](mailto:Valerie.Riley@irs.gov)

Virginia Department of Taxation  
PO Box 1115  
Richmond, VA 23218-1115  
Facsimile: (804) 254-6111

GreenTech Automotive P'ship A-3, L.P.  
21355 Ridgetop Circle  
Suite 250  
Sterling, VA 20166  
Facsimile: (703) 666-9008  
E-mail: [Norman.Chirite@wmgta.com](mailto:Norman.Chirite@wmgta.com)

Capital Wealth Holding Limited  
c/o Newhaven Trustees (BVI)  
PO Box 933 Road Town  
Tortola, BVI VG 1110  
*Contact information not found*

Elliot P. Fitzgerald, Esq.  
Timothy Moore, Esq.  
411 East Franklin St, Ste. 600  
Richmond, VA 23219  
E-mail: [efitzgerald@spottsfain.com](mailto:efitzgerald@spottsfain.com)  
[tmoore@spottsfain.com](mailto:tmoore@spottsfain.com)

State of Mississippi  
Office of the AG/Civil Lit.  
PO Box 220  
Jackson, MS 39205  
Facsimile: 601 359-2003  
E-mail: [jbobo@ago.state.ms.us](mailto:jbobo@ago.state.ms.us)

Tunica County, Mississippi  
c/o John Keith Perry Jr.  
5699 Getwell Road Building G5  
Southaven, MS 38672  
Facsimile: (662) 536-6868  
E-mail: [jkp@perrygriffin.com](mailto:jkp@perrygriffin.com)

American Theme Park Funds  
Management LLC  
21355 Ridgetop Circle, Ste 250  
Sterling, VA 20166-0000  
Facsimile: (703) 666-9008

Jiangsu Saleen Auto. Tech Co.  
Bldg 7&8 No. 299 Wenshui Rd  
Jingan District  
Shanghai PR CHINA  
Facsimile: (888) 729-4827

Gulf Coast Funds Management, LLC  
21355 Ridgetop Circle  
Suite 250  
Sterling, VA 20166  
Facsimile: (703) 666-9008  
E-mail: [Norman.Chirite@wmgta.com](mailto:Norman.Chirite@wmgta.com)



Norma Anderson  
Tax Collector, Tunica Co.  
PO Box 655  
Tunica, MS 38676  
E-mail: Norma.Anderson@tunicagov.com

Virtual Integrated Analytics  
Solutions Inc.  
1400 Broadfield Blvd Ste 325  
Houston, TX 77084  
E-mail: boscarzturk@viascorp.com  
support@viascorp.com

Quality Metalcraft Inc.  
33355 Glendale Avenue  
Livonia, MI 48150  
Facsimile: (734) 261-5180  
E-mail: sales@qualitymetalcraft.com

Swoosh Technologies & Solution  
1422 Elbridge Payne Road  
Suite 230  
Chesterfield, MO 63017  
Facsimile: (636) 778-9188

Futuris Auto Interiors  
Unit 3807 38th Fl BM Bus Cntr  
No. 100 Yutong Rd, Zhabei Dist  
Shanghai PR CHINA  
E-mail: dyang@futurigroup.com

Akerman LLP  
IOLA Account  
666 Fifth Street, 20th Floor  
New York, NY 10103  
E-mail: Brian.miller@akerman.com  
Michael.mena@akerman.com

Sheehan & Associates, PLC  
1460 Walton Blvd.  
Suite 102  
Rochester, MI 48309  
Facsimile: (248) 650-5368  
E-mail: sheehanlawyers@aol.com

Honigman Miller Schwartz & Cohn  
2290 First National Building  
660 Woodard Avenue  
Detroit, MI 48226  
Facsimile: (313) 465-7403  
E-mail: jlockhart@honigman.com

P7/Buchanan Pinkard Lakeside  
PO Box 780052  
Philadelphia, PA 19178  
Facsimile: 703-406-4290  
E-mail: kate.root@cushwake.com

Global Steering Systems, LLC  
PO Box 210  
Watertown, CT 06795  
Facsimile: (860) 945-5400  
E-mail: sales@globalsteering.com

Jonathan D. Link  
Gerard Fox Law P.C.  
3050 K Street, N.W.  
Washington, DC 20007  
E-mail: jlink@gerardfoxlaw.com

**UTILITIES SERVICE LIST**

Tunica County Utility District  
987 Harris Street  
Tunica, MS 38676  
Facsimile: (662) 363-2358

Brian L. Roberts  
Chairman, President & CEO, Comcast Corporation  
Comcast Corporation  
One Comcast Center  
1701 JFK Boulevard  
Philadelphia, PA 19103  
E-mail: brian\_roberts@comcast.com

Entergy Mississippi, Inc.  
Main Office  
308 East Pearl Street  
Jackson, MS 39201  
Facsimile: (601) 630-3515

Haley R. Fisackerly  
Chairman, CEO & President of Entergy Mississippi, Inc.  
Corporate Headquarters  
639 Loyola Avenue  
New Orleans, Louisiana 70133  
E-mail: hfisack@entergy.com

Atmos Energy Corporation  
Corporate Headquarters  
PO Box 650205  
Dallas, TX 75265-0205  
Facsimile: (972) 855-3075

Michael E. Haefner  
President & CEO, Atmos Energy Corporation  
Three Lincoln Centre  
Dallas, TX 75240  
E-mail: Michael.Hafner@atmosenergy.com

Nextiva, Inc.  
8800 East Chaparral Rd  
Suite 300  
Scottsdale, AZ 85250  
E-mail: vfax@nextiva.com

Tomas Gorny  
Chairman & Chief Executive Officer, Nextiva, Inc.  
8800 East Chaparral Road  
Scottsdale, AZ 85250  
E-mail: tgorny@nextiva.com

AT&T Inc.  
Corporate Headquarters  
208 South Akard Street  
Dallas, TX 75202  
Facsimile: (866) 653-4525

Randall L. Stephenson  
Chairman, President & CEO, AT&T Inc.  
208 South Akard Street  
Dallas, TX 75202  
E-mail: Randall.Stephenson@att.com

AT&T Mobility LLC  
1025 Lenox Park Boulevard NE  
Atlanta, GA 30319  
Facsimile: (866) 653-4525

Peter A. Richter  
Chief Financial Officer, AT&T Mobility LLC  
1025 Lenox Park Boulevard Northeast  
Atlanta, GA 30319  
E-mail: Peter.Richter@att.com